## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Chapter 7

ERUS HOLDINGS LLC,

Case No. 23-11833-CTG

Debtor.

In re:

Chapter 7

ERUS BUILDERS, LLC,

Case No. 23-11834-CTG

Debtor.

In re:

Chapter 7

NATIONAL CLEAN ENERGY, LLC,

Case No. 23-11835-CTG

Debtor.

## **DECLARATION OF THE CHAPTER 7 TRUSTEE**

In support of the Motion To Authorize Joint Administration Of Cases Pursuant To Federal Rule Of Bankruptcy Procedure 1015(b) George L. Miller, as Chapter 7 Trustee (the "<u>Trustee</u>") for the estates of Erus Holdings, LLC, Erus Builders, LLC, and National Clean Energy, LLC, (collectively, the "<u>Debtors</u>") certifies that the following information is true and correct to the best of my knowledge, information, and belief:

- On or about November 8, 2023, the Debtors each filed Chapter 7 cases for relief under the United States Bankruptcy Code.
- 2. On or about November 9, 2023, I was appointed as Chapter 7 Trustee to each of the Debtors' cases.

- Upon a review of each of the Debtors' petitions and schedules, it is clear that a significant majority of the Debtors' assets and creditors belong to Erus Builders LLC, Case No. 23-11834-CTG.
- 4. Each of the Debtors are affiliates as defined by 11 U.S.C. § 101(2).
- 5. Joint administration of the Debtors' cases is appropriate under Bankruptcy Rule 1015(b) and section 105 of the Bankruptcy Code.
- 6. Joint administration of the Debtors' estates will be less costly and burdensome than the separate administration of each estate and will promote the economical and efficient administration of the Debtors' estates to the benefit of the Trustee, the Debtors, creditors, the United States Trustee, and the Court.

By:

George L. Miller, Esq.

Chapter 7 Trustee

Date: December 5, 2023